

United States Courts  
Southern District of Texas  
FILED

MAY 03 2016

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. H-16-004-S

vs.

[REDACTED]

RUDY FLORES  
AKA "GUERO"  
AKA "JAIME FLORES"  
AKA "CHELELO"

[REDACTED]

FILED UNDER SEAL

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

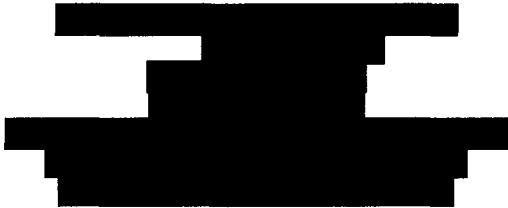
(Conspiracy to Possess With Intent to Distribute Controlled Substance)

Between on or about January 1, 2010 and continuing up to the date of the Indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants**,

[REDACTED]

RUDY FLORES

AKA "GUERO"  
AKA "JAIME FLORES"  
AKA "CHELELO"



did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jurors to possess with intent to distribute a controlled substance. All the above-named defendants conspired to possess with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

**COUNT TWO**

**(Conspiracy to Import a Controlled Substance)**

Between on or about January 1, 2010 and continuing up to the date of the Indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

[REDACTED]  
[REDACTED]  
[REDACTED]  
**RUDY FLORES**  
**AKA "GUERO"**  
**AKA "JAIME FLORES"**  
**AKA "CHELELO,"**  
[REDACTED]  
[REDACTED]

did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jurors to import, from Mexico into the United States, a controlled substance. All the above-named defendants conspired to import, from Mexico into the United States, 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 963, 952(a), 960(a)(1) and (b)(1).

**COUNT THREE**

**(Conspiracy to Launder Monetary Instruments)**

From on or about January 1, 2010, and continuing up to the date of the Indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**RUDY FLORES**  
**AKA "GUERO"**  
**AKA "JAIME FLORES"**  
**AKA "CHELELO,"**  
[REDACTED]  
[REDACTED]

did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jurors to transport monetary instruments, that is an amount of United States currency, from a place in the United States to a place outside the United States, that is the United Mexican States, with the intent to promote the carrying on of a specified unlawful activity, that is, the manufacturing, importation, sale and distribution of controlled substances as described in this Indictment and in violation of the Controlled Substances Act.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and (h).

**COUNT FOUR**

**(Possession With Intent to Distribute Controlled Substance)**

On or about October 17, 2011, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

[REDACTED]

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 500 grams or more, that is approximately 1 kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT FIVE**

**(Possession With Intent to Distribute Controlled Substance)**

On or about March 26, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

[REDACTED]  
[REDACTED]  
[REDACTED]  
**RUDY FLORES**  
**AKA "GUERO"**  
**AKA "JAIME FLORES"**  
**AKA "CHELELO,"**  
[REDACTED]  
[REDACTED]

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 500 grams or more, that is approximately 1 kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT SIX**

**(Possession With Intent to Distribute Controlled Substance)**

On or about April 18, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

[REDACTED]

**RUDY FLORES  
AKA "GUERO"  
AKA "JAIME FLORES"  
AKA "CHELELO,"**

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 5 kilograms or more, that is approximately 17 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT SEVEN**

**(Possession With Intent to Distribute Controlled Substance)**

On or about November 9, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

[REDACTED]  
[REDACTED]  
[REDACTED]  
**RUDY FLORES**  
**AKA "GUERO"**  
**AKA "JAIME FLORES"**  
**AKA "CHELELO,"**  
[REDACTED]

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 100 grams or more, that is approximately 2 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.



**COUNT EIGHT**

**(Possession With Intent to Distribute Controlled Substance)**

On or about December 6, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendants,**

[REDACTED]  
[REDACTED]  
[REDACTED]  
**RUDY FLORES**  
**AKA "GUERO"**  
**AKA "JAIME FLORES"**  
**AKA "CHELELO,"**  
[REDACTED]  
[REDACTED]

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 5 kilograms or more, that is approximately 40 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT NINE**

**(Possession With Intent to Distribute Controlled Substance)**

On or about December 6, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendant,**

[REDACTED]

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 50 grams or more, that is approximately 2,290 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**COUNT TEN**

**(Possession With Intent to Distribute Controlled Substance)**

On or about December 6, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **Defendant,**

[REDACTED]

did knowingly and intentionally possess with intent to distribute a controlled substance. This violation involved a quantity of 28 grams or more, that is approximately 61 grams, of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

**COUNT ELEVEN**

**(Unlawful Possession of a Firearm by Illegal Alien)**

On or about December 6, 2015, in the Southern District of Texas, the defendant,

[REDACTED]

who, being an alien that is illegally and unlawfully in the United States, did knowingly possess in and affecting interstate and foreign commerce, a firearm, namely, a Smith & Wesson, model SW40F, .40 caliber pistol, serial number PAJ5560.

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2).

[illegible]

[illegible]

[illegible]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED] third party;  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON  
United States Attorney

By: CASEY N. MACDONALD  
Assistant United States Attorney